

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

REBECCA TERRY,

Plaintiff,

v.

COUNTY OF MILWAUKEE, *et al.*,

Defendants.

**DECLARATION OF DOUGLAS S. KNOTT IN SUPPORT OF MILWAUKEE COUNTY
DEFENDANTS' CIVIL L.R. 7(H) EXPEDITED NON-DISPOSITIVE MOTION TO
COMPEL INTERROGATORY RESPONSES**

STATE OF WISCONSIN)
) ss:
MILWAUKEE COUNTY)

I, Douglas S. Knott, declare as follows pursuant to 28 U.S.C. § 1746:

1. That I am one of the attorneys of record for Defendants Milwaukee County, Richard Schmidt, Brian Wenzel, Carolyn Exum, Morgan Bevenue, and Margaret Hoover (the “County Defendants”).

2. I make this Declaration upon personal knowledge and in support of County Defendants’ Civil L.R. 7(h) Expedited Non-Dispositive Motion to Compel Interrogatory Responses.

3. Attached hereto as Exhibit A is a true and correct copy of the deposition transcript of Rebecca Terry dated June 1, 2018.

4. Attached hereto as Exhibit B is a true and correct copy of Plaintiff’s Responses to Defendants’ First Set of Interrogatories dated March 5, 2018.

5. Attached hereto as Exhibit C is a true and correct copy of Plaintiffs' Supplemental Responses to Defendants' First Set of Interrogatories dated June 19, 2018.

6. Attached hereto as Exhibit D is a true and correct copy of Plaintiff's Supplemental Rule 26(a)(1) Disclosures dated March 15, 2018.

Pursuant to 28 U.S.C. § 1746 I declare under penalty of perjury that the foregoing is true and correct.

Dated this 20th day of June, 2018.

LEIB KNOTT GAYNOR LLC
Attorneys for County Defendants

By: *s/Douglas S. Knott*

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